

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

**IN RE:**

<b>ARTHUR CHARLES BARCLAY III and SHANNA LYNN WOLF, DEBTORS,</b>	§ § § § §	<b>CASE NO. 20-30563-HCM</b>
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**AGREED MOTION TO OBTAIN RELIEF FROM AUTOMATIC  
STAY TO PROCEED WITH SUIT FOR DIVORCE**

**TO THE HON. H. CHRISTOPHER MOTT, UNITED STATES BANKRUPTCY JUDGE:**

COMES NOW, ARTHUR CHARLES BARCLAY III and SHANNA LYNN WOLF, Debtors, by and through the undersigned attorney, and files this Agreed Motion to Obtain Relief from Automatic Stay to Proceed with Suit for Divorce. Debtors would respectfully show the Court as follows:

1. On or about March 29, 2020, Debtors filed for relief under Chapter 7 of Title 11, United States Code.
2. The Debtors wish to file and prosecute a suit for divorce in El Paso County, Texas.
3. The Debtors respectfully request that the Court grant the instant agreed motion so that they may continue with their divorce proceeding.
4. A copy of the proposed agreed order granting the agreed Motion is attached hereto.

WHEREFORE, PREMISES CONSIDERED, ARTHUR CHARLES BARCLAY III and SHANNA LYNN BARCLAY, Debtors, pray that pursuant to Section 362(b)(2) of the Bankruptcy Code, and pursuant to the agreement of the parties, this Court enter an order terminating the automatic stay in order for the Debtors to file for Divorce and the Debtors be granted such other and further relief as is just.

DATED this 7<sup>th</sup> day of May, 2020.

RESPECTFULLY SUBMITTED,

THE LAW OFFICES OF CHERYL S. DAVIS, PC  
Attorney for Movant  
11601 Pellicano Dr., Bldg. B-18  
El Paso, Texas 79936  
(915) 565-9000  
(915) 565-9191 (fax)

By: /s/ Cheryl S. Davis  
CHERYL S. DAVIS  
SBN: 24002456

CERTIFICATE OF SERVICE

I hereby certify that true and correct copy of the foregoing was mailed or sent via the Court's electronic system to the Debtors, Arthur Charles Barclay III and Shanna Lynn Wolf, 5276 Private Factor #B, El Paso, TX 79906; Mr. Ronald Ingalls, P.O. Box 2867, Fredericksburg, TX 78624-1927 and the United States Trustee, P.O. Box 1539, San Antonio, TX on the 7th day of May, 2020.

/s/ Cheryl S. Davis  
CHERYL S. DAVIS

Arthur C. Barclay III  
ARTHUR CHARLES BARCLAY III,  
Shanna Lynn Wolf  
SHANNA LYNN WOLF